

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PARTNERS HEALTHCARE SOLUTIONS)	
HOLDINGS, L.P.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 13-1767-RGA
)	
UNIVERSAL AMERICAN CORP.,)	
)	
Defendant.)	
)	

MOTION TO REMAND

Plaintiff Partners Healthcare Solutions Holdings, L.P. hereby moves this Court for an Order remanding this case pursuant to 28 U.S.C. § 1447(c) and supporting authority to the Delaware Court of Chancery and awarding payment of just costs and actual expenses, including attorneys' fees, incurred as a result of the removal. The grounds for remand are set forth in the attached Brief in Support of Motion to Remand Action to State Court.

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November 27, 2013

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.1

Local Rule 7.1.1 requires the filing of a certificate for all non-dispositive motions. Pursuant to *In re U.S. Healthcare*, 159 F.3d 142 (3d Cir. 1998), this Motion to Remand is a dispositive motion under applicable law. Nonetheless, we have informed opposing counsel of our intent to file this motion and they have refused to consent to the relief sought herein.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 27, 2013, the foregoing MOTION TO REMAND and CERTIFICATE PURSUANT TO LOCAL RULE 7.1.1 was caused to be served upon the following counsel of record via CM/ECF:

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